

(32)

THE UNITED STATES DISTRICT COURT  
FOR THE STATE OF DELAWARE

Jourdean Lorah - Pro- Se

Case Number -1:06 CV-539-SLR

v.

**Department of Natural Resources  
Environmental Control-Defendants  
PMA Corporation- Defendants**

Attorney - Jennifer Hurvitz

2007 AUG -2 PM 1:22

CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
FILED  
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**MOTION TO AMMEND ARTFUL PLEADINGS  
AND MOTION TO DISMISS COMPLAINT AS MOOT**

**Plaintiff, Jourdean Lorah respectively prays that The United States District Court will grant her an ammendment to the Memorandum Order on July 16, 2007. Plaintiff, Jourdean Lorah is an established artist who often has work in exhibitions throughout the year. Recently, on June 29, 2007, the Plaintiff, Jourdean Lorah sold another piece of fine art work, titled "Apple" in an exhibition at The Rehoboth Art Gallery in Rehoboth Beach, Delaware. There were five pieces of art work on exhibition and four pieces are still remaining in the gallery. Plaintiff, stated earlier when this case was filed that she was an artist and she provided the courts with copies of all of her art work that she had sold.**

**Recently, the Plaintiff received her right to sue letter from the EEOC under Title VII, ADA and The Equal Pay Act. Plaintiff, Jourdean Lorah also received a letter**

*Jourdean Lorah*

from the Senator regarding the discrimination. Therefore, the discrimination has been verified. Plaintiff, Jourdean Lorah objects to the ruling or order of moot. The discrimination is not moot and it is the problem/violation. Plaintiff, Jourdean Lorah's rights have been violated and obviously those in position who have a duty are not worthy of their duty. Cole V. Arkansas, 333 Ark. 387, 216 S.W. 2d. 402 states it is unlawful to for any person or persons to assemble at an entry/exit, or near any place where a labor dispute exist using force or violence or prevent an individual from participating in a vocation/activity. The cite also states that it is unlawful for any person or persons acting by himself or as a member of a group/organization with others to promote or encourage the aid of an unlawful assemblage. All agents, officials and those government employees who investigate discrimination or the rights of one civilly and criminally were notified.

Misapprehension of the law has defrauded me. I am not Jordan Lorah, I am not a man nor am I a prisoner. Turnbill V. Fink, 668 A.2d 1370 (Del. 1995). The cite also states that Historical preservation is important. My mother is photographed in the book "Reflections of an Orphan". Plaintiff, needs to take care of the bills and mange a home. Plaintiff, Jourdean Lorah was not charged criminally and was not notified of any wrongdoing. I Jourdean Lorah, the Plaintiff is the person who originally filed a complaint with DNREC and the PMA Corporation regarding her rights that were violated environmentally. Presently, it is discrimination and I have the right to a court appointed attorney. The violations have defrauded me and it is a felony to neglect my right to work concerning a full time position with benefits and equal pay. Plaintiff, Jourdean Lorah stated her case and has proved that all of the

**agents and officials that were involved were notified. Plaintiff, Jourdean Lorah has a special agent/contact. Plaintiff taught the wildlife extinction courses through Fairfax, County VA. The wildlife must also be protected. Plaintiff, knows that DNREC has a duty to protect the wildlife which is federated. Plaintiff, Jourdean Lorah objects to the ruling of moot. Plaintiff, Jourdean Lorah's pleadings are artful as an established artist with her fine art work in all media.**

**Statement of Facts**

**Letter from Senator..... 1.**

**EEOC Right To Sue Letter ..... 2.**

**Rehoboth Art League - Sale of Art work.....3.**

JOSEPH R. BIDEN, JR.  
DELAWARE

[www.biden.senate.gov](http://www.biden.senate.gov)

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SUITE 2000  
WILMINGTON, DELAWARE 19801-1233  
(302) 573-6345

# United States Senate

JUDICIARY SUBCOMMITTEE  
ON CRIME AND DRUGS  
CHAIRMAN

FOREIGN RELATIONS COMMITTEE  
CHAIRMAN

CAUCUS ON INTERNATIONAL  
NARCOTICS CONTROL  
CHAIRMAN

CONGRESSIONAL INTERNATIONAL  
ANTI-PIRACY CAUCUS  
CO-CHAIRMAN

ANTI-METH CAUCUS  
CO-CHAIRMAN

April 19, 2007

Ms. Jourdean Lorah  
114 Walls Avenue  
Wilmington, DE 19805

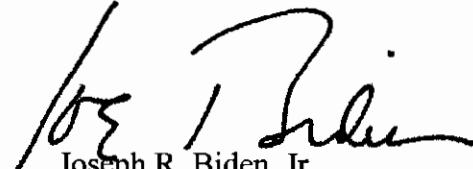
Dear Ms. Lorah:

Thank you for your letter updating me with your issues in the workplace. As I said before, the rights of employees to be free from discrimination in their compensation is protected under several laws, including the Equal Pay Act of 1963 and Title VII of the Civil Rights Act of 1964.

Unfortunately, as a United States Senator I cannot offer legal advice or counsel. In my previous letter, I suggested that you contact the Community Legal Aid Society at (302) 575-0660. Community Legal Aid Society offers legal services to those who cannot afford an attorney. It seems from your descriptions in your letter of the frustration you have experienced, it is best that you consult an attorney for legal advice.

Again, thank you for contacting my office and I am hopeful that the information I have provided will assist you with any legal issues or questions.

Sincerely,



Joseph R. Biden, Jr.  
United States Senator

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## DISMISSAL AND NOTICE OF RIGHTS

To: Jourdean S. Lorah  
114 Walls Avenue  
Wilmington, DE 19805

From: Philadelphia District Office  
21 South 5th Street  
Suite 400  
Philadelphia, PA 19106

On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR § 1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

17C-2007-00480

Charles Brown, III,  
State & Local Coordinator

(215) 440-2842

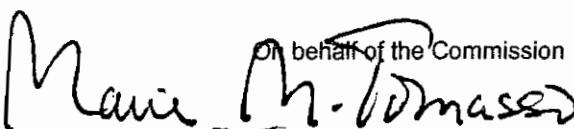
## THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- Your allegations did not involve a disability as defined by the Americans with Disabilities Act.
- The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge.
- Having been given 30 days in which to respond, you failed to provide information, failed to appear or be available for interviews/conferences, or otherwise failed to cooperate to the extent that it was not possible to resolve your charge.
- While reasonable efforts were made to locate you, we were not able to do so.
- You were given 30 days to accept a reasonable settlement offer that affords full relief for the harm you alleged.
- The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- Other (briefly state)

**- NOTICE OF SUIT RIGHTS -**  
(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS** of your receipt of this Notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred **more than 2 years (3 years)** before you file suit may not be collectible.



On behalf of the Commission  
Marie M. Tomasso

July 19, 2007

Enclosure(s)

Marie M. Tomasso,  
District Director

(Date Mailed)

cc: TATNALL SCHOOL

Thomas R. Hunt, Jr., Esq.  
MORRIS, NICHOLS, ARSHT & TUNNELL, LLP  
P.O. Box 1347  
1201 North Market Street  
Wilmington, DE 19899

THE REHOBOTH ART LEAGUE, INC.

25549

Jourdean Lorah

Date	Type	Reference
6/29/2007	Bill	13249

	Original Amt.	Balance Due	Discount	Payment
	122.50	122.50		122.50
			Check Amount	122.50

Checking Mercantile B Apple J Lorah	122.50
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY that on this day of Aug. 2, 2007,**  
**that all documents were sent or delivered to the Defendants.**

**PMA Corporation  
P.O. Box 25249  
LeHigh Valley, Pennsylvania 18002-5249**

**DNREC  
89 King's Highway  
Dover, Delaware 19801**

**Attorney Jennifer Hurvitz  
824 N. Market Street Suite 902  
Wilmington, Delaware 19899-0709**